

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

James T. Smith, Robert Terry, Paul Brown,)	
and Harvey Everett,)	
)	
Plaintiffs,)	08 C 0579
)	
v.)	Judge Joan H. Lefkow
)	
Invsco Group, Ltd.; Plaza 440 Private)	Magistrate Judge Nan R. Nolan
Residences Condominium Association;)	
Admiral Security Services, Inc.; and Edy)	
Klein,)	
)	
Defendants.)	

**DEFENDANTS PLAZA 440 PRIVATE RESIDENCES CONDOMINIUM
ASSOCIATION'S AND EDY KLEIN'S RULE 26(a)(1) DISCLOSURES**

Defendants Plaza 440 Private Residences Condominium Association ("Plaza 440") and Edy Klein ("Klein"), by and through their attorneys, Litchfield Cavo, LLP, pursuant to Federal Rule of Civil Procedure 26(a)(1) make the following initial disclosures to the plaintiffs:

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use in support of its claims or defenses, unless solely for impeachment, identifying the subject matter of the information:**

Plaza 440 and Edy Klein reserve the right to supplement these disclosures as additional information becomes available. Investigation continues.

1. Edy Klein, Plaza 440's Property Manager. From early 2005 until May 31, 2007, Ms. Klein supervised plaintiffs and maintained their personnel files. Ms. Klein has information related to the plaintiffs' employment records, performance of their job duties, resident complaints about plaintiffs, and employment-related decisions made from early 2005 until May 31, 2007. Ms. Klein also has information about the decision to outsource the doormen's contract to Admiral Security Services, Inc. ("Admiral") and

other factual allegations of the complaint. Ms. Klein can be contacted through her attorneys.

2. Chuck Patterson, Plaza 440's Assistant Property Manager. Mr. Patterson has knowledge of plaintiffs' performance of their job duties; of plaintiffs' disciplinary history; and of Plaza 440 resident complaints about plaintiffs. Mr. Patterson can be contacted through counsel for Plaza 440.
3. Kweli Bond, Plaza 440 Private Residences. Ms. Bond has knowledge of plaintiffs' performance of their job duties; of plaintiffs' disciplinary history; and of Plaza 440 resident complaints about plaintiffs. Ms. Bond further has knowledge of the complaint of harassment she filed against certain doormen. Ms. Bond can be contacted through counsel for Plaza 440.
4. William O'Leary, Invsco Group, Ltd. For all times relevant to the complaint, Mr. O'Leary supervised Ms. Klein. Mr. O'Leary has information about the day-to-day management of Plaza 440, the transfer of control of the building to Plaza 440, the decision to outsource the doormen's contract to Admiral, and other factual allegations in the complaint. Mr. O'Leary can be contacted through Invsco's attorneys.
5. Scott Wadsworth, Plaza 440 Board Member. Mr. Wadsworth has knowledge of the interrelationship among Plaza 440, Invsco, and Admiral and the resident complaints against plaintiffs. Mr. Wadsworth can be contacted through counsel for Plaza 440.
6. Brian Statter, Plaza 440 Board Member. Mr. Statter has information regarding the behavioral history of several plaintiffs. He also has knowledge of Plaza 440's plan to outsource the doorman staff to Admiral, beginning in 2005. Mr. Statter can be reached through counsel for Plaza 440.
7. Arnold Schepel, Plaza 440 Board Member. Mr. Wadsworth has knowledge of the interrelationship among Plaza 440, Invsco, and Admiral and the resident complaints against plaintiffs. Mr. Wadsworth can be contacted through counsel for Plaza 440.
8. Michael Malicki, Plaza 440 Board Member. Mr. Malicki has knowledge of the interrelationship among Plaza 440, Invsco, and Admiral and the resident complaints against plaintiffs. Mr. Malicki can be contacted through counsel for Plaza 440.

9. Terry Kurzynski has knowledge of the interrelationship among Plaza 440, Invsco, and Admiral and the resident complaints against plaintiffs. Mr. Kurzynski can be contacted through counsel for Plaza 440.
10. Gene Weisskopf, Admiral Security Services. Mr. Weisskopf has information about the contract Admiral has with Plaza 440 as well as the disciplinary problems with the plaintiffs since June 1, 2007. Mr. Weisskopf can be contacted through Admiral's attorneys.
11. James Smith, Plaintiff. Mr. Smith has knowledge of the resident complaints filed against him. Mr. Smith can be reached through his attorney.
12. Paul Brown, Plaintiff. Mr. Brown has knowledge of the resident complaints filed against him. Mr. Brown can be reached through his attorney.
13. Robert Terry, Plaintiff. Mr. Terry has knowledge of the resident complaints filed against him. Mr. Terry can be reached through his attorney.
14. Harvey Everett, Plaintiff. Mr. Everett has knowledge of the resident complaints filed against him. Mr. Everett can be reached through his attorney.

B. A copy of, or a description by category and location of, all documents, data, compilations, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to supports its claims or defenses, unless solely for impeachment:

The documents being produced pursuant to these disclosures are forthcoming. Plaza 440 and Edy Klein reserve the right to supplement this production as their investigations continue.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary materials, not privileged or protected from disclosure, on which such computation is based, including materials baring on the nature and extent of injuries suffered:

None.

- D. **Inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment:**

Plaza 440 Private Residences purchased insurance from Travelers, that may provide coverage for some or all of plaintiff's claims. The relevant portion of that policy can be made available for inspection and copying upon request.

Respectfully Submitted,

Plaza 440 Private Residences Condominium
Association and Edy Klein

s/ Bradford A. LeHew
One of their Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2008, I electronically filed the foregoing **Rule 26(a)(1) Disclosures** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorneys of record.

By: s/ Bradford A. LeHew

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